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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE ABEL DE LOS SANTOS-NINO,
aka "Jose Abel Delossantos,"
aka "Jose Abel de los Santos,"
aka "Jose Dejesus Delossantos,"
aka "Ninojose Abel Delossantos,"

Defendant.

Case No. 2:21-mj-00749- DJA

**Stipulation for an Order
Directing Probation to Prepare
a Criminal History Report**

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney, and Jared L. Grimmer, Assistant United States Attorney, counsel for the United States of America, and Margaret Wightman Lambrose, Assistant Federal Public Defender, counsel for Defendant JOSE ABEL DE LOS SANTOS-NINO, that the Court direct the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

This stipulation is entered into for the following reasons:

1 1. The United States Attorney's Office has developed an early disposition
 2 program for immigration cases, authorized by the Attorney General pursuant to the
 3 PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has
 4 extended to the defendant a plea offer in which the parties would agree to jointly request an
 5 expedited sentencing immediately after the defendant enters a guilty plea.

6 2. The U.S. Probation Office cannot begin obtaining the defendant's criminal
 7 history until after the defendant enters his guilty plea unless the Court enters an order
 8 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of
 9 a defendant's initial appearance when charged by indictment.

10 3. The U.S. Probation Office informs the government that it would like to begin
 11 obtaining the criminal history of defendants eligible for the early disposition program as
 12 soon as possible after their initial appearance so that the Probation Office can complete the
 13 Presentence Investigation Report by the time of the expected expedited sentencing.

14 4. Accordingly, the parties request that the Court enter an order directing the
 15 U.S. Probation Office to prepare a report detailing the defendant's criminal history.

16 DATED this 7th day of September, 2021.

17 Respectfully Submitted,

18 RENE L. VALLADARES
 19 Federal Public Defender

 CHRISTOPHER CHIOU
 Acting United States Attorney

20 /s/ Margaret W. Lambrose
 21 MARGARET WIGHTMAN LAMBROSE
 22 Assistant Federal Public Defender
 23 Counsel for Defendant JOSE ABEL
 24 DE LOS SANTOS-NINO

/s/ Jared L. Grimmer
 JARED L. GRIMMER
 Assistant United States Attorney

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**Order Directing Probation to Prepare
a Criminal History Report**

Based on the stipulation of counsel, good cause appearing, and the best interest of justice being served:

IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history.

DATED this 10th day of September, 2021.



DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE